

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
Erika Nyborg-Burch, CA Bar No. 342125
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsflp.com
brichardson@bsflp.com
enyborg-burch@bsflp.com

James Lee (admitted *pro hac vice*)
Rossana Baeza (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
jlee@bsflp.com
rbaeza@bsflp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100
Fax: (310) 789-3150
abonn@susmangodfrey.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
(admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas,
32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
mram@forthepeople.com
rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
MORGAN & MORGAN
711 Van Ness Ave, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF AMANDA BONN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO AMEND COMPLAINT
(R. CIV. P. 15(a))**

The Honorable Yvonne Gonzalez Rogers
Courtroom 1 - 4th Floor
Date: March 15, 2022
Time: 2:00 p.m.

DECLARATION OF AMANDA BONN

I, Amanda Bonn, declare as follows.

1. I am a partner with the law firm of Susman Godfrey LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' motion for leave to amend complaint (Dkt. 395).

3. In its opposition to Plaintiffs' motion to amend, Google argues that "Plaintiffs seek Rule 30(b)(6) testimony about Google Ad Sense" (Opp'n at 9), which is one of the Google tracking and advertising mechanisms that would fall within Plaintiffs' amended class definition. But Plaintiffs dropped their request for 30(b)(6) testimony on Ad Sense weeks ago. On February 16, 2022, in a draft of the parties' 30(b)(6) disputes letter brief, Plaintiffs told Google that they were no longer seeking 30(b)(6) testimony on Ad Sense.

4. The parties thereafter filed their joint letter brief on disputed 30(b)(6) topics, and Magistrate Judge van Keulen issued a ruling on February 22, 2022. Dkt. 418. Plaintiffs are not appealing that ruling. Rather, the parties are scheduling and preparing for those 30(b)(6) depositions, consistent with the Court's order.

5. Attached hereto as **Exhibit 1** is a true and correct copy of a February 18, 2022 email sent from Google's counsel to my colleagues.

6. Attached hereto as **Exhibit 2** is excerpts from the November 24, 2021 deposition of Google employee Abdelkarim Mardini.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of March, 2022, at Los Angeles, California.

/s/ Amanda Bonn